

LAW OFFICES OF ALAN E. FERGUSON
Alan E. Ferguson, Esq., State Bar No. 103677
3200 Fourth Avenue, Suite 207
San Diego, CA 92103-5716
PH: 619-299-4999
FAX: 619-299-8121

Attorney for Material Witness

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

(Honorable Louisa S. Porter)

UNITED STATES OF AMERICA,)	Criminal Case No. 08cr0209-IEG
)	
Plaintiff,)	
)	
v.)	NOTICE OF MOTION AND MOTION
)	FOR VIDEOTAPE DEPOSITION AND
)	RELEASE OF MATERIAL WITNESS:
)	Abel Camargo-Tapia
George Luis Quiroz-Cota, et al.,)	
)	
)	HRG DATE: 02/19/2008
Defendant.)	TIME: 2:00 p.m.
)	CRTRM: H, 1st Floor
)	JUDGE: Louisa S. Porter

TO UNITED STATES ATTORNEY KAREN P. HEWITT, ASSISTANT UNITED STATES ATTORNEY DOUGLAS KEEHN; TO MARC BRUCE GELLER, ATTORNEY FOR DEFENDANT, GEORGE LUIS QUIROZ-COTA; AND TO STEVEN HUBACHEK, ATTORNEY FOR DEFENDANT, JOSE LUIS AGUILAR-ZAMORA:

PLEASE TAKE NOTICE that on February 19, 2008, at 2:00 p.m., counsel will move this Court for an order to take the video deposition of material witness, Abel Camargo-Tapia, and for his immediate release thereafter.

MOTION

Material witness, Abel Camargo-Tapia, through his counsel, Alan E. Ferguson, and pursuant to Federal Rules of Criminal Procedure, Rule 15, 18 U.S.C., §3144; and 18 U.S.C., §3142, hereby move this Court for an order to take his deposition by videotape and release him at the conclusion

1 of the deposition.

2 This motion is based on the notice of motion, declaration of counsel, the memorandum of
3 points and authorities attached and filed herewith, the records of the above-titled case, and all
4 matters submitted to the court prior to the determination of this motion.

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6 Dated: February 1, 2008

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By: / S / Alan E. Ferguson
ALAN E. FERGUSON
Attorney for the Material Witness

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